

**IRA A. COHEN**  
**ATTORNEY AT LAW**  
3155 ROUTE 10  
SUITE 211  
DENVER, NEW JERSEY 07834

Tele: 973-328-4900

Fax: 973-328-1510

July 22, 2025

**Via Email: chambers of SLM@nj.uscourts.gov**

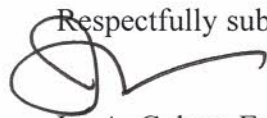
Honorable Stacey L. Meisel, U.S.B.J.  
Martin Luther King, Jr. Federal Building  
50 Walnut Street, 3<sup>rd</sup> Floor  
Court Room 3A  
Newark, New Jersey 07103

**RE: Michael J. Arnold - Bankruptcy Case No.: 23-15062-SLM**

Dear Judge Meisel:

Please be advised the office of the undersigned represents Debtor, Michael J. Arnold with regard to the above referenced matter. This office was served with a Notice of Motion to Vacate the Automatic Stay as a result of the allegation of the Debtor failing to make payment on a 2018 Toyota Rav4 motor vehicle. Immediately upon receipt of said Motion I contacted my client and ascertained that he had been making all of the required payments and forwarded proof of same to counsel for the creditor a copy of said correspondence is enclosed herewith along with copies of those payments. At that time, I requested that the creditor withdraw their application pending before the Court. Not hearing from counsel, I again forwarded additional correspondence dated June 23, 2025 again respectfully requesting the withdrawal of the Notice of Motion with no reply. I followed up these requests with emails dated July 3, 2025, July 17, 2025 again without response requesting a 30 day adjournment in order to file opposition before the Court.

Respectfully I am requesting that the Court adjourn the matter for 30 days in order to allow the undersigned to file opposition pleadings to oppose the Motion to Vacate the Automatic Stay of creditor's counsel. I apologize for this late hour request however, I have tried every professional courtesy to resolve this matter without success. Most respectfully I would request that an adjournment be granted and that your Chambers notify the undersigned at my email [iracohen3155@gmail.com](mailto:iracohen3155@gmail.com).

Respectfully submitted,  
  
Ira A. Cohen, Esq.

IAC/jv

Enc.

cc.: Michael Arnold (via email)  
Larua Egerman, Esq. ([NJ ECF Notices@mccalla.com](mailto:NJ_ECF_Notices@mccalla.com))  
([laura.egerman@mccalla.com](mailto:laura.egerman@mccalla.com))  
Marie Ann Greenberg, Chapter 13 Trustee ([magecf@magtrustee.com](mailto:magecf@magtrustee.com))  
Denise Carlon, Esq. ([dcarlon@kmlawgroup.com](mailto:dcarlon@kmlawgroup.com))

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June 16, 2025

**Via Email: NJ ECF Notices@mccalla.com & Regular Mail**

Larua Eggerman, Esq.  
McCalla Raymer Leibert Peirce, LLP  
485 F US Highway 1 S, Suite 300  
Islin, New Jersey 08830

**RE: Michael J. Arnold**  
**Bankruptcy Case No.: 23-15062-SLM**

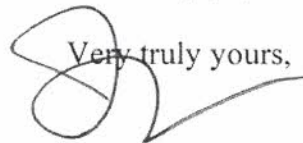
Dear Ms. Eggerman:

Please be advised the undersigned represents Michael Arnold, Debtor with regard to the above matter. I am in receipt of your Notice of Motion to Vacate Automatic Stay as a result of the conception that you have that my client has failed to make payment on a monthly basis to your client, Capital One for the months of March, April and May. I enclose herewith documentary proof from my client's checking account that he paid Capital One Auto the following:

1. March 12, 2025 - \$350.92
2. April 7, 2025 - \$350.92
3. May 7, 2025 - \$350.92
4. June 12, 2025 - \$350.92

Clearly these payments have been made and your clients accounting is less than stellar. Accordingly, I am requesting that you immediately withdraw your Notice of Motion so that my client need not formally file a responsive objection to the Motion as required by the Rules of Court. I would urge that you confer with your client as clearly payments have been made.

Very truly yours,



Ira A. Cohen, Esq.

IAC/jv

Enc.

cc.: Michael Arnold (via email)  
Mary Ann Greenberg, Chapter 13 Trustee

3:03

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Sign  
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EVERYDAY  
CHECKING ...5732

\$949.91

Available balance ⓘ

Search by  
keyword

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03/12/2025

Balance

5

\$1,468.91

✓ 03/12/2025 \$350.92

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3:01

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# 8972

✓ 04/07/2025 \$3,232.00

ONLINE

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\$949.91

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5 \$4,272.52

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Sign  
off

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June 23, 2025

**Via Email: NJ ECF Notices@mccalla.com & Regular Mail**

Larua Eggerman, Esq.

McCalla Raymer Leibert Peirce, LLP

485 F US Highway 1 S, Suite 300

Islin, New Jersey 08830

**RE: Michael J. Arnold**

**Bankruptcy Case No.:**

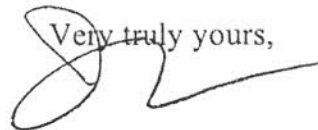
**23-15062-SLM**

Dear Ms. Eggerman:

On June 16, 2025 I had occasion to forward to you correspondence, a copy of which is attached hereto, indicating that your client has received each and every monthly payment for the automobile loan that you have filed for vacation of the automatic stay to proceed against the automobile of my client. In light of this showing, will you kindly advise as to whether you have confirmed same with your client and will withdraw the Notice of Motion that you have pending.

If I do not receive your advice with respect to withdrawing the Notice of Motion to vacate the automatic stay, I will have to file opposition to your application which will include a request for counsel fees as a result of the frivolous application of your client due to their inaccurate and/or negligent bookkeeping. I look forward to your most prompt response.

Very truly yours,



Ira A. Cohen, Esq.

IAC/jv

Enc.

cc.: Michael Arnold (via email)